

EXHIBIT B

Proposed Order

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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SECURITIES AND EXCHANGE COMMISSION, :

Plaintiff, :

-v- :

No. 16-cv-6848 (BMC)

PLATINUM MANAGEMENT (NY) LLC; :
PLATINUM CREDIT MANAGEMENT, L.P.; :
MARK NORDLICHT; :
DAVID LEVY; :
DANIEL SMALL; :
URI LANDESMAN; :
JOSEPH MANN; :
JOSEPH SANFILIPPO; and :
JEFFREY SHULSE, :

Defendants. :
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[PROPOSED]
ORDER APPROVING RECEIVER’S MOTION FOR ORDER
APPROVING HER SETTLEMENT WITH SCHAFER AND WEINER, PLLC

THIS MATTER coming before the Court on the Motion (along with all supporting papers, the “***Motion***”) of Melanie L. Cyganowski, the duly appointed receiver (the “***Receiver***”) of Platinum Credit Management, L.P., Platinum Partners Credit Opportunities Master Fund LP, Platinum Partners Credit Opportunities Fund (TE) LLC, Platinum Partners Credit Opportunities Fund LLC, Platinum Partners Credit Opportunities Fund (BL) LLC, Platinum Liquid Opportunity Management (NY) LLC, Platinum Partners Liquid Opportunity Fund (USA) L.P., Platinum Partners Liquid Opportunity Master Fund L.P., Platinum Partners Credit Opportunities Fund International Ltd and Platinum Partners Credit Opportunities Fund International (A) Ltd (collectively, the “***Receivership Entities***” and the receivership estates of which, the “***Receivership Estate***”), for entry of an order approving the Settlement Agreement between the

Receiver and Schafer and Weiner, PLLC ("**S&W**"), executed January 16, 2020 (the "**Settlement**"), a fully-executed copy of which is attached as Exhibit A to the Receiver's Declaration in Support of the Motion [Dkt. Nos. ____] and the Court having considered the Motion and exhibits and other documents filed in support of the Motion; and the Court having found that the Motion complies with applicable standards for granting the relief requested therein and that the settlement is in the best interests of the Receivership; and after due deliberation and for good and sufficient cause shown; it is hereby

ORDERED that the Motion is granted; and it is further

ORDERED that the Settlement, and each of the terms therein, is approved; and it is further

ORDERED that, in accordance with the terms of the Settlement, each of the Receiver and the Receivership Entities is hereby permanently enjoined from filing or pursuing any claim against S&W, its partners, shareholders, members, employees, agents and representatives which in any way arises from or relates to S&W's representation of the Receivership Estate or any of the Receivership Entities, except for any claim for payments or performance due from S&W under the terms of the Settlement or the exhibit thereto; and it is further

ORDERED that, in accordance with the terms of the Settlement, the United States Securities and Exchange Commission is hereby permanently enjoined from filing or pursuing any monetary claim against S&W, its partners, shareholders, members, employees, agents and representatives for damage to the Receivership Estate which in any way arises from or relates to S&W's representation of the Receivership Estate or any of the Receivership Entities, except for any claim for payments or performance due from S&W under the terms of the Settlement or the exhibit thereto.